

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

08/27/2004 P 2:45

<p>UNITED STATES OF AMERICA) Plaintiff) v.) LOI VAN NGUYEN) Defendant)</p>	<p>UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS CRIMINAL COMPLAINT CASE NO. 04-10086-RCL</p>
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**ASSENTED TO MOTION TO CONTINUE
DATE FOR CHANGE OF PLEA AND SENTENCING**

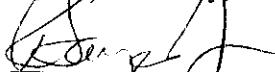
NOW COMES the Defendant, Loi Van Nguyen, by and through undersigned Counsel, and respectfully requests an order of this Honorable Court continuing the Change of Plea and Sentencing Hearing date in the above-captioned action, currently scheduled for Wednesday, September 8, 2004 at 2:00 p.m. to Wednesday, October 6, 2004 or a date thereafter and as reasons therefore states as follows:

1. The Defendant has entered into a Plea Agreement with the government, dated March 23, 2004. The Plea Agreement in the above-captioned matter, calls for a potential downward departure pursuant to U.S.S.G. § 5K 1.1, however the government needs additional time to review the matter to determine whether such motion will be filed.
2. The additional time will allow the government an opportunity to review this matter and allow both parties to prepare for the Sentencing Hearing in this matter.
3. The Defendant agrees that the time should be excluded under the Speedy Trial Act pursuant to 18 U.S.C § 3161(h)(8).

4. Counsel for the government, Assistant United States Attorney Laura J. Kaplan, assents to the within motion.

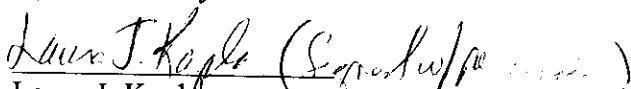
WHEREFORE, the Defendant requests that this Honorable Court allow this Assented to Motion to Continue.

Respectfully submitted
Loi Van Ngyuen
By His Attorney,


Raymond Sayeg, BBO #555437
Law Offices of Raymond Sayeg
Four Longfellow Place, 35th Floor
Boston, MA 02114
(617) 742-1184

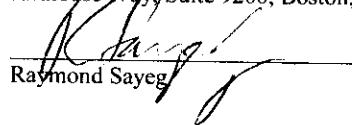
Dated: August 25, 2004

Assented to:
United States of America
By Its Attorney


Laura J. Kaplan,
Assistant United States Attorney
U.S. Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210
(617)748-3124

CERTIFICATE OF SERVICE

I, Raymond Sayeg, hereby certify that a true and exact copy of the foregoing Assented to Motion to Continue Date for Change of Plea and Sentencing was served this 25 day of August, 2004, by first class mail upon United States District Attorney, Laura J. Kaplan, U.S. Attorney's Office, 1 Courthouse Way, Suite 9200, Boston, MA 02210.


Raymond Sayeg